

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARK S. SCOTT,

Defendant.

NO.: 17-cr-00630 (ER)

**NOTICE OF MOTION FOR
DISCLOSURE OF *BRADY*
MATERIAL**

ECF CASE

PLEASE TAKE NOTICE THAT, upon the declaration of David Garvin, dated May 14, 2019, and upon the accompanying memorandum of law, the Defendant Mark S. Scott will move this Court before the Honorable Edgardo Ramos, United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 619, New York, New York 10007, at a time to be determined by the Court, for an Order directing the Government to immediately produce all *Brady* material in possession or control of the prosecution team, including specific categories of information that go to the core knowledge and intent issues central to this case and for such other relief as the Court may deem to be just and proper. The Brady material includes, but is not limited to:

- Any evidence that any regulator, government body or judicial authority determined that OneCoin was engaged in legitimate business activity;
- Any evidence that any financial services provider, law firm, or other third-party service provider did business with OneCoin or any of its affiliates after due diligence;
- Any evidence tending to show that Mr. Scott was not aware that any of the funds he is alleged to have laundered were proceeds of unlawful activity.

Dated: May 14, 2019

Respectfully submitted,

/s/ David M. Garvin

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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2019, I electronically filed Defendant's NOTICE OF MOTION FOR DISCLOSURE OF BRADY MATERIAL with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the parties in this case:

Christopher Joseph DiMase, AUSA;
foJulieta Veronica Lozano, AUSA
Nicholas Folly, AUSA
James Nobles, Esq.

/s/ David M. Garvin

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